

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR RESPONSE TO
SPECIAL MASTER'S
RECOMMENDATION**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Uber Technologies, Inc. and
7 Ottomotto LLC's Administrative Motion to File Under Seal Their Response to Special Master's
8 Recommendation (the "Administrative Motion"). The Administrative Motion seeks an order sealing
9 highlighted portions of Defendants' Response to Special Master's Recommendation ("Uber's
10 Response") and the entirety of Exhibits A-D thereto.

11 3. The portions of Uber's Response and Exhibits C-D identified below contain or refer to
12 confidential business information, which Waymo seeks to seal.

13 4. Uber's Response (portions marked in red boxes in version filed herewith) and Exhibits
14 C-D (portions highlighted in green in version filed herewith) contain, reference, and/or describe highly
15 confidential and sensitive business information. The information Waymo seeks to seal regards
16 confidential policies regarding off-the-record communications. I understand that this confidential
17 business information is maintained by Waymo as secret. The public disclosure of this information
18 would give Waymo's competitors access to information about Waymo's business practices. If such
19 information were made public, I understand that Waymo's competitive standing would be
20 significantly harmed.

21 5. Waymo's request to seal is narrowly tailored to those portions of Uber's Response and
22 Exhibits C-D that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on December 26, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

11
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven